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Counsel for the Debtor

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | |
|-------------------|--------------------------|
| ----- | X |
| In re: | : |
| | : Chapter 11 |
| | : |
| JOSEPH KLAYNBERG, | : Case No. 22-10165 (MG) |
| | : |
| | : |
| Debtor, | : |
| | : |
| ----- | X |

**NOTICE OF MONTHLY FEE STATEMENT FOR DEBTOR'S COUNSEL
FOR THE MONTH OF AUGUST 2022**

PLEASE TAKE NOTICE that pursuant to the Order of the Bankruptcy Court dated March 11, 2022 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, the Monthly Fee Statement for Debtor's Counsel for the month of August 2022 is attached hereto.

Dated: Garden City, New York
September 19, 2022

CULLEN AND DYKMAN LLP
Counsel for Debtor

By: s/ Bonnie Pollack
Matthew G. Roseman, Esq.
Bonnie L. Pollack, Esq.
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Tax ID: 11-0658700

JOSEPH KLAYNBERG

September 14, 2022

INVOICE SUMMARY

File Number: 22420

Control Number 7013684

FOR PROFESSIONAL SERVICES rendered through August 31, 2022 in connection with the matters referenced below, as more fully detailed on the attached.

| Matter # | Matter Description | Fees | Costs | Total |
|----------|---|-----------|--------|-----------|
| 1 | GENERAL ADMINISTRATION | 7,606.50 | .00 | 7,606.50 |
| 3 | ASSET DISPOSITION, SALE OR RESTRUCTURE | 28,380.50 | .00 | 28,380.50 |
| 4 | RESOLUTION OF CREDITOR ISSUES | 11,524.00 | .00 | 11,524.00 |
| 6 | PLAN & DISCLOSURE STATEMENT | 21,370.50 | .00 | 21,370.50 |
| 8 | RETENTION/PROFESSIONAL COMPENSATION/FEE | 4,131.00 | .00 | 4,131.00 |
| 9 | PREPARATION FOR/ATTEND COURT HEARING | 7,858.50 | .00 | 7,858.50 |
| 10 | SERVICES RELATING TO LITIGATION | 535.50 | .00 | 535.50 |
| 11 | MOTION PRACTICE | 11,053.50 | .00 | 11,053.50 |
| 12 | OPERATING REPORTS | 535.50 | .00 | 535.50 |
| 13 | DISBURSEMENTS | .00 | 518.94 | 518.94 |
| 14 | TRAVEL | 2,295.00 | .00 | 2,295.00 |
| 16 | NAHLA 2004 MOTION | 3,153.00 | .00 | 3,153.00 |
| Total | | 98,443.50 | 518.94 | 98,962.44 |

TOTAL THIS INVOICE

\$ 98,962.44

FOUNDED 1850

NEW YORK NEW JERSEY WASHINGTON DC



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JOSEPH KLAYNBERG

September 14, 2022

For Professional Services Rendered Through August 31, 2022:

File Number: 22420-1

Control Number 7013684

RE: GENERAL ADMINISTRATION

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|---------|------|--|-------|----------|
| 8/05/22 | BLP | Discussion with MR in preparation of call with client all matters in case (.3); lengthy discussion with client re status of case, 8/17 hearings, depositions, sales, etc. (.5) | .80 | 612.00 |
| 8/08/22 | BLP | Lengthy discussion with client re amendments to plan, options, sale of interests | .80 | 612.00 |
| 8/08/22 | BLP | Emails with UST and interested parties with amended documents (.2); letter to court with documents (.2) | .40 | 306.00 |
| 8/10/22 | BLP | Lengthy discussion with B. Procida re claim, oversight committee, 114 MS negotiations, status of all motions (.3); emails with Nahla re evidentiary hearings (.2) | .50 | 382.50 |
| 8/17/22 | BLP | Discussions after hearing with F. Stevens re sale motion, case (.3); discussion with client re outcome of hearing, go forward process (.2) | .50 | 382.50 |
| 8/11/22 | MGR | Conf w/ B Pollack regarding litigation/case strategy moving forward regarding plan/sales process | .60 | 492.00 |
| 8/18/22 | BLP | Discussion with client re motions filed in case (.2); discussion with A. Thaler re outcome of hearing, case going forward (.2) | .40 | 306.00 |
| 8/22/22 | BLP | Lengthy discussion with client re motions in case and responses to same | 1.70 | 1,300.50 |
| 8/23/22 | BLP | Discussion with client re projections for distributions of entities if remain in possession of same and review projections sent | .40 | 306.00 |
| 8/24/22 | BLP | Discussion with S. Flynn re projections, assumptions | .30 | 229.50 |

JOSEPH KLAYNBERG
22420-001-1Control #: 7013684
September 14, 2022

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|---|-------|-------------|
| 8/24/22 | BLP | Comms re Nahla questions on life insurance policies | .20 | 153.00 |
| 8/25/22 | BLP | Comms with A. Thaler (.2), client (.2) and email to R. Rich (.2) re response to questions on life insurance policy | .60 | 459.00 |
| 8/26/22 | BLP | Comms with Nahla re extension of time only for insurance exemption issues (.2); review and approve stipulation re same (.2) | .40 | 306.00 |
| 8/29/22 | BLP | Emails with accountants re updated periodic reports, time frame, etc. | .30 | 229.50 |
| 8/29/22 | BLP | Meeting with client re all motions, sale of equity and terms of sale, 114 MS loan negotiations | 1.40 | 1,071.00 |
| 8/29/22 | BLP | Discussion with R. Rich re life insurance policy issues, reservation of rights, request for written stipulation from him | .20 | 153.00 |
| 8/30/22 | BLP | Review periodic reports and email to client re same | .40 | 306.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 7,606.50 |
| TOTAL THIS MATTER | | | | \$ 7,606.50 |

JOSEPH KLAYNBERG
22420-001-3

Control #: 7013684
September 14, 2022

RE: ASSET DISPOSITION, SALE OR RESTRUCTURE

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|---------|------|---|-------|--------|
| 8/01/22 | BLP | Prepare amendment to Sands Point contract (.5); several emails with Chase and F. Stevens re same (.4) | .90 | 688.50 |
| 8/01/22 | BLP | Revise sale order re Chase changes (.2); emails with Chase and F. Stevens re same (.2) | .40 | 306.00 |
| 8/01/22 | BLP | Comms with client re amendments to contract, order (.2); file all amendments with court and letter to court re same (.3) | .50 | 382.50 |
| 8/01/22 | BLP | Discussion with Hilco re sale of interests, issues with same | .30 | 229.50 |
| 8/01/22 | MGR | Review proposed changes to contract for sale of residence; discuss same w./ B Pollack | .30 | 246.00 |
| 8/01/22 | MGR | Phone conf w/ J Hubbard of A & G regarding potential engagement to sell interests of debtor | .40 | 328.00 |
| 8/01/22 | MGR | E-emails w/ J Parker of Hilco regarding potential engagement to market assets | .30 | 246.00 |
| 8/02/22 | MGR | E-mail and phone conf w/ J Hubbard of A & G Realty regarding conducting sales process for debtors minority interests in RE companies | .60 | 492.00 |
| 8/03/22 | MGR | E-mails w/ J Hubbard of A & G Realty regarding nature of sales process and role of A & G | .20 | 164.00 |
| 8/04/22 | MGR | Phone conf w/ J Hubbard regarding sales process of minority interests in RE companies | .30 | 246.00 |
| 8/05/22 | BLP | Call with MR and broker re sale process, background, documents, strategy | .30 | 229.50 |
| 8/05/22 | MGR | Conf call w/ A & G Realty (J Hubbard and E Amendola) w/ B Pollack regarding sales process for minority interests of debtor in real estate projects | .50 | 410.00 |
| 8/05/22 | MGR | Follow up call w/ J Hubbard regarding sale of minority interests and supporting documents | .30 | 246.00 |
| 8/08/22 | BLP | Review and emails with client regarding A&G engagement proposal | .40 | 306.00 |
| 8/08/22 | MGR | Review retention proposal and discuss same with J J Hubbard of A & G | .60 | 492.00 |
| 8/09/22 | BLP | Chart out equity interests for sale process | .90 | 688.50 |

JOSEPH KLAYNBERG
22420-001-3

Control #: 7013684
September 14, 2022

| Date | Init | Description | Hours | Amount |
|---------|------|--|-------|----------|
| 8/10/22 | MGR | Review NAHLA objection to sale of Sands point residence . | .50 | 410.00 |
| 8/11/22 | BLP | Review objection to sale motion | .40 | 306.00 |
| 8/11/22 | BLP | Prepare reply to objection to sale motion | 3.70 | 2,830.50 |
| 8/11/22 | BLP | Discussion with F. Stevens re objection to sale and hearing on same | .30 | 229.50 |
| 8/11/22 | MGR | Review reply to NAHALA objection to sale of sands point residence and discuss w/ B Pollack | .50 | 410.00 |
| 8/11/22 | MGR | Research sub rosa plan issue raised in NAHLA objection and email B Pollack and M Kwiatkowski regarding same | .70 | 574.00 |
| 8/12/22 | BLP | Finalize sale reply papers | .30 | 229.50 |
| 8/12/22 | MGR | E-mails regarding A & G retention | .30 | 246.00 |
| 8/15/22 | BLP | Discussion with Chase counsel re sale motion and hearing (.2); review Emily statement re sale motion (.3) | .50 | 382.50 |
| 8/19/22 | MGR | Phone conf w/ J Hubbard re engagement and related issues concerning sale of interests in entities | .40 | 328.00 |
| 8/22/22 | BLP | Work on motion to sell interests | 1.20 | 918.00 |
| 8/22/22 | BLP | Discussion with J.Hubbard re stalking horse issues (.2); discussion with M. McMahon re sale strategy (.2) | .40 | 306.00 |
| 8/23/22 | BLP | Continued extensive work on motion to sell interests and bid procedures | 2.80 | 2,142.00 |
| 8/24/22 | BLP | Extensive work on sale procedures and motion | 2.30 | 1,759.50 |
| 8/24/22 | BLP | Revise sale order per county request and emails with county re same | .30 | 229.50 |
| 8/26/22 | BLP | Review order to sell Sands Point (.1); comms with M. Roseman and F. Stevens re same, title, closing documents (.4) | .50 | 382.50 |
| 8/29/22 | BLP | Discussion with C. Mullin re Sands Point closing documents, closing | .20 | 153.00 |
| 8/29/22 | BLP | Comms with broker re bid procedures (.2); follow up discussion with brokers re procedures, consents, motion terms, etc. (.3) | .50 | 382.50 |
| 8/29/22 | MGR | Review bidding procedures and discuss same with B Pollack | .60 | 492.00 |
| 8/30/22 | BLP | Work on motion to retain broker | 1.80 | 1,377.00 |
| 8/30/22 | BLP | Continued work on sale motion for equity interests | 1.90 | 1,453.50 |
| 8/30/22 | BLP | Continued review and preparation of consent section needed for sale motion | .90 | 688.50 |

JOSEPH KLAYNBERG
22420-001-3

Control #: 7013684
September 14, 2022

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|--|-------|---------------------|
| 8/30/22 | BLP | Work on bid procedures order re equity interests | .60 | 459.00 |
| 8/30/22 | MGR | Review revised bid procedures and discuss process w/ B Pollack | .60 | 492.00 |
| 8/31/22 | BLP | Continued work on broker motion | 1.00 | 765.00 |
| 8/31/22 | BLP | Draft form contract for equity interests | 1.90 | 1,453.50 |
| 8/31/22 | BLP | Discussion with C. Mullin re closing for Sands Point, timing, etc. | .20 | 153.00 |
| 8/31/22 | BLP | Continued work on sale order, procedures order and notice of auction | 1.10 | 841.50 |
| 8/31/22 | BLP | Extensive work on reviewing and preparing consents section for sale motion | 1.20 | 918.00 |
| 8/31/22 | MGR | Phone conf w/ J Hubbard regarding information needed for sales process | .40 | 328.00 |
| 8/31/22 | MGR | Review and provide comments to revised bid procedures and sales order | .50 | 410.00 |
| 8/31/22 | MK | Legal research regarding need for time records w/ broker | .90 | 405.00 |
| 8/31/22 | MK | Prepare draft revision to retention application | .50 | 225.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 28,380.50 |
| TOTAL THIS MATTER | | | | \$ 28,380.50 |

JOSEPH KLAYNBERG
22420-001-4

Control #: 7013684
September 14, 2022

RE: RESOLUTION OF CREDITOR ISSUES

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|---------|------|---|-------|----------|
| 8/02/22 | BLP | Lengthy discussion with M. McMahon re Hartford restructure documents, issues for estate | .80 | 612.00 |
| 8/02/22 | BLP | Review and revise email to Connecticut counsel re issues with and comments to restructuring documents | .30 | 229.50 |
| 8/02/22 | MKM | Teleconference with B. Pollack regarding loan modification issues; prepare summary for replacement guarantor's counsel regarding potential issues/ changes. | 1.90 | 1,358.50 |
| 8/03/22 | MKM | Respond to questions regarding revisions to Spectra loan modification documents. | .40 | 286.00 |
| 8/04/22 | MKM | Review communications and operating agreements regarding proposed winddown of sponsor projects. | .40 | 286.00 |
| 8/05/22 | BLP | Discussion with M. McMahon re 111 Fulton lender requests, questions | .20 | 153.00 |
| 8/05/22 | MKM | Teleconferences with B. Pollack and J. Klaynberg regarding 111 Fulton transaction (.5); prepare summary of same for B. Pollack (.3) | .80 | 572.00 |
| 8/10/22 | BLP | Conference with MR re Wilmington Trust issues | .20 | 153.00 |
| 8/11/22 | BLP | Review and respond to emails re PNC release of 111 Pearl guaranties | .40 | 306.00 |
| 8/12/22 | BLP | Review email from B. Procida re WT dischargeability issues (.2) and discussion with M. Roseman re same (.3) | .50 | 382.50 |
| 8/12/22 | BLP | Discussion with R. Banich and B. Procida re WT issues re dischargeability | .40 | 306.00 |
| 8/15/22 | BLP | Discussion with client re WT issues and background | .30 | 229.50 |
| 8/16/22 | BLP | Review comms re 114 MS loan documentation re issues in case (.3); emails with B. Procida re same (.2); emails with client re same (.2) | .70 | 535.50 |
| 8/16/22 | MKM | Review amendment to operating agreement and prepare summary of same for B. Pollack; email with client regarding same. | .90 | 643.50 |
| 8/17/22 | BLP | Comms with B. Procida and client re motion proposed by WT and allegations made | .80 | 612.00 |
| 8/17/22 | BLP | Research re issues attendant to WT claims in case | .50 | 382.50 |
| 8/19/22 | MKM | Review PNC revisions to 111 Pearl amendments. | .50 | 357.50 |

JOSEPH KLAYNBERG
22420-001-4

Control #: 7013684
September 14, 2022

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|---|-------|--------------|
| 8/20/22 | BLP | Emails re Connecticut PNC documents and issues with releases in same | .30 | 229.50 |
| 8/22/22 | BLP | Discussion with M. McMahon re releases in Connecticut matters, strategy in light of motions in case | .20 | 153.00 |
| 8/22/22 | MKM | Teleconference with B. Pollack regarding revisions to releases. | .10 | 71.50 |
| 8/23/22 | BLP | Comms with R. Rich re Connecticut release issues (.2); comms with client and M. McMahon re same (.2) | .40 | 306.00 |
| 8/23/22 | MKM | Review release documents and prepare summary of same. | 2.40 | 1,716.00 |
| 8/25/22 | BLP | Discussions with R. Rich (.2); M. McMahon (.3) and MM and Connecticut counsel (.2) re release issues, 9019 motions, etc. | .70 | 535.50 |
| 8/25/22 | MKM | Teleconferences with B. Pollack and L. Bortolan regarding loan amendments. | .80 | 572.00 |
| 8/26/22 | BLP | Comms with Connecticut counsel re objection to claims once guaranties released | .20 | 153.00 |
| 8/30/22 | BLP | Lengthy discussion with J. Schechter (representing 114 MS) re discussions with Rialto, effect on estate, etc. (.3); review and respond to email re documents requested by Rialto (.2) | .50 | 382.50 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 11,524.00 |
| TOTAL THIS MATTER | | | | \$ 11,524.00 |

JOSEPH KLAYNBERG
22420-001-6

Control #: 7013684
September 14, 2022

RE: PLAN & DISCLOSURE STATEMENT

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|---------|------|---|-------|----------|
| 8/01/22 | BLP | Several conferences with M. Roseman and review of documents strategizing plan administrator/litigation trust issues | 1.20 | 918.00 |
| 8/01/22 | BLP | Discussion with Valley counsel and email to WT counsel re litigation trust concept and trust board | .30 | 229.50 |
| 8/02/22 | BLP | Draft plan amendment and review of ancillary documents for use re same | 2.40 | 1,836.00 |
| 8/02/22 | BLP | Discussion with B. Procida re plan administrator/trust concepts | .20 | 153.00 |
| 8/02/22 | MGR | Review litigation trust and plan administrator oversight committee structure regarding amendments to Plan | 1.30 | 1,066.00 |
| 8/03/22 | BLP | Discussion with M. Bunin and emails with B. Procida re plan administrator oversight board | .40 | 306.00 |
| 8/03/22 | MGR | Conf w/ B Pollack regarding structure of plan and use of an oversight board for plan administrator | .40 | 328.00 |
| 8/05/22 | BLP | Work on amended plan | 1.50 | 1,147.50 |
| 8/05/22 | MGR | Conf call w/ J Klaynberg and B Pollack regarding update concerning plan structure and deposition of E Klaynberg | .50 | 410.00 |
| 8/06/22 | BLP | Continued work on plan amendments and send to client for review | .50 | 382.50 |
| 8/06/22 | BLP | Draft Plan Administrator agreement and send to client for review | 3.30 | 2,524.50 |
| 8/08/22 | BLP | Draft DS amendments | .90 | 688.50 |
| 8/08/22 | BLP | Finalize and file all amendments to plan, DS and plan admin agreement | 1.20 | 918.00 |
| 8/10/22 | MGR | Review NAHALA objection to disclosure statement | .70 | 574.00 |
| 8/11/22 | BLP | Review DS objection | .60 | 459.00 |
| 8/11/22 | MGR | Review reply NAHLA objection to disclosure statement and discuss comments with B Pollack | 1.00 | 820.00 |
| 8/11/22 | MK | Legal research regarding disclosure statement objection | 1.70 | 765.00 |
| 8/11/22 | MK | Draft insert for inclusion in reply on approval of disclosure statement | 1.50 | 675.00 |
| 8/12/22 | BLP | Continued review of DS issues and prepare reply to DS objection | 4.10 | 3,136.50 |

JOSEPH KLAYNBERG
22420-001-6

Control #: 7013684
September 14, 2022

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|--|-------|--------------|
| 8/12/22 | MGR | Review revised reply to disclosure statement objection and provide comments | .80 | 656.00 |
| 8/15/22 | BLP | Review and respond to emails with UST re further changes to DS (.3); letter to court re additional agreed changes to same (.3) | .60 | 459.00 |
| 8/18/22 | BLP | Amendments to plan and DS (and review objection again re same) | 1.40 | 1,071.00 |
| 8/18/22 | MGR | Review and provide comments to revised plan and discuss same w/ B Pollack | 1.20 | 984.00 |
| 8/19/22 | BLP | Comms with client re Plan and DS changes (.2); finalize and file amended documents and email to chambers re same (.5) | .70 | 535.50 |
| 8/19/22 | MGR | Provide minor comments to plan language | .40 | 328.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 21,370.50 |
| TOTAL THIS MATTER | | | | \$ 21,370.50 |

JOSEPH KLAYNBERG
22420-001-8

Control #: 7013684
September 14, 2022

RE: RETENTION/PROFESSIONAL COMPENSATION/FEE

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|---|-------|-------------|
| 8/02/22 | BLP | Emails with all professionals re May fee payments and revise chart re same | .40 | 306.00 |
| 8/03/22 | BLP | Prepare monthly fee statement and letter to client re same | .60 | 459.00 |
| 8/11/22 | BLP | Prepare CNO for C&D fee application (.3); emails to professionals for amounts in sale order (.2); revise order (.2) | .70 | 535.50 |
| 8/12/22 | BLP | Draft CNOs all other fee applications (.4); further revise fee order (.2) | .60 | 459.00 |
| 8/12/22 | BLP | Prepare and file notices of July fee statements (all except Banich) | .40 | 306.00 |
| 8/14/22 | BLP | File and email all CNOs to chambers re fee applications | .40 | 306.00 |
| 8/16/22 | BLP | Emails and revise chart re payment of June fees (.3); prepare and file July fee statement Banich (.3) | .60 | 459.00 |
| 8/17/22 | BLP | File and circulate Banich fee statement (.2); revise fee order and send to chambers (.4) | .60 | 459.00 |
| 8/18/22 | BLP | Review fees in order and amend for error (.3); comms with chambers re same (.1); emails to client and all professionals re additional fee payments per order (.4) | .80 | 612.00 |
| 8/19/22 | BLP | Review and emails re correction to fees to be paid to Thaler | .30 | 229.50 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 4,131.00 |
| TOTAL THIS MATTER | | | | \$ 4,131.00 |

JOSEPH KLAYNBERG
22420-001-9

Control #: 7013684
September 14, 2022

RE: PREPARATION FOR/ATTEND COURT HEARING

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|--|-------|-------------|
| 8/10/22 | MGR | Conf w/ B Pollack regarding NAHLA objections and strategy for 8/17 hearing | .60 | 492.00 |
| 8/15/22 | BLP | Prepare, file and email to all lengthy hearing agenda | 1.10 | 841.50 |
| 8/15/22 | BLP | Compile all pleadings for 8/17 hearings | .30 | 229.50 |
| 8/15/22 | MGR | Review agenda and discuss hearing strategy w/ B Pollack | .40 | 328.00 |
| 8/16/22 | BLP | Hearing prep (STN) | .60 | 459.00 |
| 8/16/22 | BLP | Hearing prep (Sale) | 1.00 | 765.00 |
| 8/16/22 | BLP | Hearing prep (DS) | 1.00 | 765.00 |
| 8/16/22 | BLP | Hearing prep (fee app) | .50 | 382.50 |
| 8/16/22 | BLP | Lengthy discussion with F. Stevens in prep for sale hearing | .50 | 382.50 |
| 8/16/22 | MGR | Review and respond to emails from B Pollack regarding hearing strategy | .40 | 328.00 |
| 8/17/22 | BLP | Prepare for and attend lengthy hearings on multiple matters in case | 2.70 | 2,065.50 |
| 8/17/22 | MGR | Attend omnibus hearing | 1.00 | 820.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 7,858.50 |
| TOTAL THIS MATTER | | | | \$ 7,858.50 |

JOSEPH KLAYNBERG
22420-001-10

Control #: 7013684
September 14, 2022

RE: SERVICES RELATING TO LITIGATION

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|---|-------|-----------|
| 8/05/22 | BLP | Emails with R. Banich re strategy re continuation of appeals | .20 | 153.00 |
| 8/08/22 | BLP | Discussion with Thaler re discovery information needed for initial disclosures in adversary proceeding (.3); email information to Thaler (.2) | .50 | 382.50 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 535.50 |
| TOTAL THIS MATTER | | | | \$ 535.50 |

JOSEPH KLAYNBERG
22420-001-11

Control #: 7013684
September 14, 2022

RE: MOTION PRACTICE

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|---|-------|--------------|
| 8/01/22 | BLP | Review Wilmington Trust pleading re STN motion | .20 | 153.00 |
| 8/02/22 | BLP | Begin work on STN motion reply | .40 | 306.00 |
| 8/03/22 | BLP | Continued preparation of reply re STN motion | 2.10 | 1,606.50 |
| 8/03/22 | MGR | Review and revise reply to motion for derivative standing and discuss same w/ B Pollack | .70 | 574.00 |
| 8/04/22 | BLP | File and email service of reply re STN motion to Nahla, UST and Wilmington Trust (.3); review and respond to UST email re same (.2) | .50 | 382.50 |
| 8/17/22 | MGR | Review of NAHLA motion to appoint trustee | 1.00 | 820.00 |
| 8/22/22 | BLP | Review and outline trustee motion | 1.10 | 841.50 |
| 8/22/22 | BLP | Review and outline WT motion re leave to file complaint | .70 | 535.50 |
| 8/23/22 | BLP | Conferences re research needed for response to motions for trustee and extension of time | .40 | 306.00 |
| 8/23/22 | MA | Summarize case law from trustee motion. | 3.80 | 1,064.00 |
| 8/25/22 | BLP | Begin response to WT motion | 1.10 | 841.50 |
| 8/26/22 | BLP | Work on response to Wilmington Trust motion | 1.50 | 1,147.50 |
| 8/29/22 | BLP | Revise response to Wilmington Trust motion | .90 | 688.50 |
| 8/29/22 | MGR | Review reply to Wilmington Trust motion and discuss same with B Pollack | .50 | 410.00 |
| 8/31/22 | BLP | Work on BP declaration re trustee motion | .60 | 459.00 |
| 8/31/22 | BLP | Work on JK affidavit re trustee motion | 1.20 | 918.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 11,053.50 |
| TOTAL THIS MATTER | | | | \$ 11,053.50 |

JOSEPH KLAYNBERG
22420-001-12

Control #: 7013684
September 14, 2022

RE: OPERATING REPORTS

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|--|-------|-----------|
| 8/05/22 | BLP | Review and comment on MOR and backup documents | .30 | 229.50 |
| 8/06/22 | BLP | File MOR (.2); emails with UST re same (.2) | .40 | 306.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 535.50 |
| TOTAL THIS MATTER | | | | \$ 535.50 |

JOSEPH KLAYNBERG
22420-001-13

Control #: 7013684
September 14, 2022

RE: DISBURSEMENTS

DISBURSEMENTS

| Date | Description | Amount |
|---------|---|--------|
| 8/02/22 | BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR TRAIN FARE FOR TRAVEL TO/FROM NYC, BLP/KM | 28.00 |
| 8/02/22 | BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR SUBWAY FARE FOR TRAVEL TO/FROM DEPOSITION, BLP/KM | 5.50 |
| 8/03/22 | FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV # 7-829-87938 DTD 07/25/2022 SENT TO CHAMBERS OF HON. MARTIN GLENN @ US BANKRUPTCY COURT, SDNY ON 07/15/2022, BLP/KM | 14.71 |
| 8/05/22 | BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR TRAIN FARE FOR TRAVEL TO/FROM NYC FOR DEPOSITION, BLP/KM | 28.00 |
| 8/05/22 | BONNIE POLLACK, OUT-OF-TOWN TRAVEL, FOR SUBWAY FARE FOR TRAVEL TO/FROM DEPOSITION, BLP/KM | 5.75 |
| 8/09/22 | POSTAGE 08/09/2022, SK/BP | 95.85 |
| 8/09/22 | FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV # 7-836-70504 DTD 08/01/2022 SENT TO CHAMBERS HON. MARTIN GLENN @ US BANKRUPTCY COURT, SDNY ON 07/22/2022, BLP/KM | 15.29 |
| 8/09/22 | FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV # 7-836-70504 DTD 08/01/2022 SENT TO CHAMBER HON. MARTIN GLENN @ US BANKRUPTCY COURT, SDNY ON 07/28/2022, BLP/KM | 15.35 |
| 8/18/22 | MATTHEW ROSEMAN, OUT-OF-TOWN TRAVEL, FOR PARKING FOR TRAVEL TO NYC FOR DEPOSITION, MGR/KM | 20.00 |
| 8/18/22 | MATTHEW ROSEMAN, OUT-OF-TOWN TRAVEL, FOR LIRR FARE FOR TRAVEL TO NYC FOR DEPOSITION, MGR/KM | 33.50 |
| 8/19/22 | FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV # 7-844-54789 DTD 08/08/2022 SENT TO CHAMBERS OF HON. MARTIN GLENN @ US BANKRUPTCY COURT, SDNY ON 08/01/2022, BLP/KM | 15.26 |
| 8/23/22 | FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV # 7-851-89243 DTD 08/15/2022 SENT TO CHAMBER OF HON. MARTIN GLENN @ US BANKRUPTCY COURT, SDNY ON 08/05/2022, BLP/KM | 15.26 |
| 8/23/22 | FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV # 7-851-89243 DTD 08/15/2022 SENT TO CHAMBER OF HON. MARTIN GLENN @ U.S. BANKRUPTCY COURT, SDNY ON 08/09/2022, BLP/KM | 24.06 |
| 8/26/22 | CHASE CARD SERVICES, COURT FEES, CONFIRM# 6157389079 DTD 09/10/2022 FOR MOTION TO SELL FILING FEE AT NEW YORK SOUTHERN BANKRUPTCY COURT ON 07/15/2022, BLP/KM | 188.00 |
| 8/26/22 | FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV # 7-858-59513 DTD 08/22/2022 SENT TO CHAMBERS OF HON. MARTIN GLENN @ U.S. BANKRUPTCY COURT SOUTHERN DISTRICT OF NY ON 08/12/2022, BLP/KM | 14.41 |

JOSEPH KLAYNBERG
22420-001-13

Control #: 7013684
September 14, 2022

TOTAL DISBURSEMENTS \$ 518.94

TOTAL THIS MATTER \$ 518.94

JOSEPH KLAYNBERG
22420-001-14

Control #: 7013684
September 14, 2022

RE: TRAVEL

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|-----------------------------------|-------|-------------|
| 8/04/22 | BLP | Travel to/from NYC for deposition | 3.00 | 2,295.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 2,295.00 |
| TOTAL THIS MATTER | | | | \$ 2,295.00 |

JOSEPH KLAYNBERG
22420-001-16

Control #: 7013684
September 14, 2022

RE: NAHLA 2004 MOTION

PROFESSIONAL SERVICES

| Date | Init | Description | Hours | Amount |
|-----------------------------|------|--|-------|--------------|
| 8/04/22 | BLP | Attend deposition of Emily Klaynberg | 3.00 | 2,295.00 |
| 8/04/22 | BLP | Discussion with M. Roseman re Emily Klaynberg deposition | .30 | 229.50 |
| 8/04/22 | MGR | Phone conf w/ B Pollack regarding deposition of Emily Klaynberg | .30 | 246.00 |
| 8/09/22 | BLP | Review documents requested by Nahla to unseal | .30 | 229.50 |
| 8/16/22 | BLP | Comms with Nahla re request to unseal identity of individual members of entities | .20 | 153.00 |
| TOTAL PROFESSIONAL SERVICES | | | | \$ 3,153.00 |
| TOTAL THIS MATTER | | | | \$ 3,153.00 |
| TOTAL THIS INVOICE | | | | \$ 98,962.44 |



Cullen Dykman

Cullen and Dykman LLP
Garden City Center
100 Quentin Roosevelt Boulevard
Garden City, NY 11530
T: 516.357.3700
F: 516.357.3792
Tax ID: 11-0658700

JOSEPH KLAYNBERG

September 14, 2022

Control #: 7013684

REMITTANCE

Client.Matter: 22420

BALANCE DUE THIS INVOICE

\$ 98,962.44

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Garden City, NY 11530-4850

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Operating Account
100 Quentin Roosevelt Blvd.
Garden City, NY 11530-4850

TERMS: NET 30 DAYS

FOUNDED 1850

NEW YORK NEW JERSEY WASHINGTON DC

August 2022 Hours

| Timekeeper Name | | | Year Admitt ed | Rate | Hours | Amount |
|----------------------|------------|------------|----------------------|-------|-------|-------------|
| Roseman, Matthew G. | Partner | Bankruptcy | 1989 | \$820 | 19.8 | \$16,236.00 |
| Pollack, Bonnie L. | Partner | Bankruptcy | 1990 | \$765 | 95.7 | \$73,210.50 |
| McMahon, Michelle | Partner | Bankruptcy | 2005 | \$715 | 8.2 | \$5,863.00 |
| Kwiatkowski, Michael | Of Counsel | Bankruptcy | 2011 | \$450 | 4.6 | \$2,070.00 |
| Artiles, Michelle | Law Clerk | | | \$280 | 3.8 | \$1,064.00 |
| | | | | | | \$98,443.50 |